



BOULT • CUMMINGS
CONNERS • BERRY, PLC

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November 15, 2001
OFFICE OF
EXECUTIVE SECRETARY

Henry Walker
(615) 252-2363
Fax: (615) 252-6363
Email: hwalker@boultcummings.com

David Waddell, Esq.
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: Complaint of BellSouth Telecommunications, Inc. Regarding the
Practices of Global Crossing Telecommunications, Inc. in the Reporting of
Percent Interstate Usage for Compensation for Jurisdictional Access
Services
Docket No. 01-00913

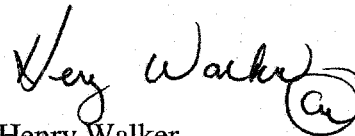
Dear David:

Please accept for filing the original and thirteen copies of the First Set of
Interrogatories and Production of Documents of Global Crossing Telecommunications, Inc. to
BellSouth Telecommunications, Inc. in the above-captioned proceeding.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:


Henry Walker

HW/nl

Attachment

c: Guy Hicks, Counsel for BellSouth Telecommunications, Inc.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE: COMPLAINT OF BELL SOUTH)	
TELECOMMUNICATIONS, INC.)	
REGARDING THE PRACTICES OF)	DOCKET NO. 01-00913
GLOBAL CROSSING)	
TELECOMMUNICATIONS, INC. IN THE)	
REPORTING OF PERCENT INTERSTATE)	
USAGE FOR COMPENSATION FOR)	
JURISDICTIONAL ACCESS SERVICES)	

RESPONDENT'S FIRST SET OF INTERROGATORIES TO COMPLAINANT

Respondent Global Crossing Telecommunications, Inc., ("Global Crossing") by its attorneys, pursuant to Rule 1220-1-2-.11 of the Tennessee Regulatory Authority, hereby requests Complainant, BellSouth Telecommunications, Inc. ("BellSouth") to respond to the Interrogatories set forth herein on or before November 23, 2001.

INSTRUCTIONS

1. For each Interrogatory for which a substantive response is withheld under a claim of privilege or work-product immunity, provide a statement identifying the privilege or immunity claimed and the facts giving rise to that privilege or immunity.

2. If you object to any Interrogatory on grounds other than privilege or work-product immunity, state in detail the basis for the objection. Further, if you object to any part of an Interrogatory, specify the part. Similarly, if you do not object to a particular Interrogatory, but are unable to respond fully to that Interrogatory, then respond to the fullest extent possible and provide an explanation for your lack of a full response.

3. If you contend that a particular Interrogatory, or a definition or an instruction applicable thereto, is ambiguous, such claim shall not provide a basis for refusing to respond. You are instructed to set forth the allegedly ambiguous language and the interpretation of that language that you have adopted in responding to the Interrogatory in question.

4. The present tense includes the past and future tenses.

5. The use of the singular form of any word includes the plural and vice-versa and shall be construed as necessary to bring within the scope of the Interrogatory all responses that might otherwise be construed to be outside of its scope.

6. The connectors "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the Interrogatory all responses that might otherwise be construed to be outside of its scope.

7. These Interrogatories are continuing in nature and require you to supply such further or different information relative thereto as you may receive up to and including the day of trial.

8. Where the name or identity of a party or person is requested, or the Interrogatory asks you to list persons, please state the full name, work title, home address, business address (including the name of the entity or business unit employing the person, where applicable), home telephone number and business telephone number of the party or person given in response, as well as (where applicable) the home telephone number of the person's immediate supervisor.

9. Unless otherwise indicated, these Interrogatories refer to the time, place and circumstances of the subject matter mentioned or set out in the Complaint in the above-referenced matter.

10. Where the knowledge or information or possession of a person is indicated, such a request includes knowledge of the person's accountants, representatives, consultants, agents, officers, directors, employees, investigators, or anyone else acting on the person's behalf.

11. All Interrogatory answers shall be given in narrative form, rather than by production of business records, unless you can demonstrate that (1) the answer to an Interrogatory may be derived or ascertained from your business records or from an examination, audit, or inspection of those business records or a compilation, abstract, or summary of them, and (2) the burden of deriving or ascertaining the answer is substantially the same for you as for Plaintiffs in this case, and (3) you have not already derived or ascertained the information requested. If you can demonstrate the foregoing then you may specify the records from which the answer may be derived or ascertained and afford Global Crossing the reasonable opportunity to examine, audit, or inspect the records and to make copies, compilations, abstracts, or

summaries. Specification shall be in sufficient detail to permit Global Crossing to locate and to identify, as readily as you, the records from which the answer may be ascertained.

DEFINITIONS

1. The term "document" is used in its broadest sense and means and includes graphic matter of any kind or nature, whether written, printed, typed, recorded, filmed, punched, transcribed, taped or produced or reproduced by any means. The term "document" means and includes, without limitation, all appraisals, records, personal notes, e-mails, cablegrams, telexes, facsimiles, studies, calendars, day-timers, diaries, desk calendars, appointment books, agendas, minutes, pamphlets, envelopes, telephone messages, graphs, records of meetings, summaries or records of telephone conversations, summaries or records of personal conversations or interviews, summaries or records of meetings or conferences, tabulations, analyses, evaluations, projections, work papers, statements, summaries, reports, journals, billing records, invoices, correspondence, letters, financial statements, balance sheets, accounting entries, tax returns, loan documents, and/or all written or recorded matter of any kind whatsoever. The term "document" also means and includes every other means by which information is recorded or transmitted including, without limitation, photographs, videotapes, tape recordings, microfilms, punchcards, computer programs, printouts, computer disks or diskettes, software, all recordings made through data processing and/or computer techniques, and the written information necessary to understand and use such materials. The term "document" is further defined to mean the original, any drafts, and any non-identical copies (*i.e.*, those bearing notations, marks, or marginalia not found on the original document). Please note that records of electronic mail, whether active, archived or otherwise recoverable, are specifically included within the above definition.

2. The term "person" refers to a natural person, a group of natural persons acting as individuals, a group of persons acting in a collegial capacity (*e.g.*, as a committee, board of directors, etc.), a trust, a corporation, a partnership, a limited partnership, a joint venture, a limited liability company, a government or governmental agency and/or any other incorporated or unincorporated business, government or entity.

3. The terms "you" and "your" refers to Complainant BellSouth, and includes each of your present or former attorneys, accountants, representatives, consultants, agents, officers, directors, employees, investigators, predecessor corporations or entities, and subsidiaries or other related entities or anyone else acting on your or their behalf.

4. The term "employees" includes any person, including all executives, managers, supervisors, and professionals, who are or have been employed on a full or part-time basis by the employer involved.

5. The term "relating to" means constituting, containing, embodying, reflecting, identifying, incorporating, referring to, dealing with or in any way in connection with or pertaining to.

6. When identifying natural or non-natural persons in your Interrogatory answers, state their full names (and any aliases and trade or fictitious names) and their current or last known business addresses and telephone numbers (or, alternatively, in the case of natural persons, their residential addresses and telephone numbers if a business address and telephone number are unknown).

7. When identifying oral, telephonic, or other electronic communications in your Interrogatory answers, state (a) when and how such communications occurred; (b) who

participated in or was otherwise present during such communications; and (c) the substance of each communication.

8. The term "communication" shall mean any meeting, statement, document, conversation, transmittal of information or request for information whether by written, oral, electronic or other means.

9. The term "Complaint" shall mean the "Complaint of BellSouth Telecommunications, Inc. Regarding the Practices of Global Crossing Telecommunications, Inc. in the Reporting of Percent Interstate Usage for Compensation for Jurisdictional Access Services," filed before the Tennessee Regulatory Authority in Docket No. 01-00913.

10. The term "PIU" refers to the Percentage Interstate Usage.

INTERROGATORIES

1. (a) State your position whether any part or all of your claims in ¶¶ 11 and 12 of the Complaint ("the Claims") that

11. After reviewing Global Crossing's call-activity records for the period from 1994 to 2000, BellSouth determined that Global Crossing had misreported its TPIU for that period. As a result of the misreported TPIU, Global Crossing paid lower intrastate access charges than it should have.

12. Based on Global Crossing's misreported TPIU, BellSouth underbilled Global Crossing \$121,853.00 for the period between 1994 and 2000 with respect to terminating access service provided in Tennessee. When applicable late-payment charges are added, the total amount that Global Crossing owes BellSouth for Tennessee is \$175,455.00.

are governed by: (i) any limitations period contained in any statute, tariff or elsewhere; and (ii) if so, set forth in detail each and every one of the Claims that are so governed, as well as the source and amount of time (example: years or months) of each such limitations period, applicable to each one of the Claims.

(b) If your answer to Interrogatory 1(a) is affirmative, set forth (i) the exact date (day, month, year) that each and every one of your Claims arose and/or accrued; (ii) the event giving rise to each of the Claims and (iii) the event triggering the accrual for each one.

(c) If your answer to Interrogatory 1(a) is negative, explain in detail: (i) why the two year limitation period for claims arising under the Telecommunications Act of 1934, as amended, 47 USC §§ 151 *et seq.*, (the "Act") does not bar each of your Claims arose and/or accrued more than two years prior to the filing of the Complaint; (ii) why the one-year limitations period set forth in the BellSouth Interstate Tariff, as amended and filed with the Federal Communications Commission, in accordance with the Act does not bar each of your Claims that arose and/or accrued more than one year prior to the filing of the Complaint; and (iii) why the one-year limitations period set forth in BellSouth's State Tariff, as amended and filed

with the Tennessee Regulatory Authority, does not bar each of your Claims that arose and/or accrued more than one year prior to the filing of the Complaint.

2. (a) State your position whether any or all of your Claims are susceptible to the equitable defense of laches.

(b) If your answer to Interrogatory 2(a) is negative, explain in detail the reason(s) for your position.

(c) If your answer to Interrogatory 2(a) is affirmative, explain in detail why any part or all of your Claims should not be dismissed on the grounds of laches.

3. (a) Prior to the time that you claimed (in ¶ 14 of the Complaint) that you "made formal written demand upon Global Crossing for payment" of amounts allegedly owed by Global Crossing to you for (allegedly) misreported terminating PIU ("TPIU") as the term "TPIU" is used in ¶ 7 of the Complaint, had you ever made an oral or written demand upon Global Crossing for allegedly misreported TPIU?

(b) If your answer to Interrogatory 3(a) is affirmative, (i) set forth the exact date (day, month, year) of each such demand; (ii) identify the person(s) at BellSouth who made each such demand; and (iii) identify the person(s) at Global Crossing upon whom each demand was made.

(c) If your answer to Interrogatory 3(a) is negative, explain in detail why no such demand(s) were made prior to the "formal written demand" referenced in ¶ 14 of the Complaint.

4. Set forth the exact date (day, month, year) that you first began as well as completed your review of "Global Crossing's call-activity records for the period from 1994 to 2000," as alleged in ¶ 11 of the Complaint.

5. Identify (i) each person who has knowledge of your review of "Global Crossing's call-activity records for the period from 1994 to 2000," as alleged in ¶ 11 of the Complaint and (ii) the exact role, if any, that each person had in connection with that review.

6. (a) Prior to the time of your review of "Global Crossing's call-activity records for the period from 1994 to 2000," as alleged in ¶ 11 of the Complaint, had you ever conducted a review of Global Crossing's call-activity records for any time from 1994 to 2000?

(b) If your answer to Interrogatory 6(a) is affirmative, set forth the exact date (day, month, year) that you first began as well as completed each such review.

(c) If your answer to Interrogatory 6(a) is negative, explain in detail why you had never conducted such a review.

7. If your answer to Interrogatory 6(a) is affirmative, identify (i) each person who has knowledge of each such review and (ii) the exact role, if any, that each person had in connection with that review.

8. (a) Have any of your customers ever sought a credit from you for any misreported TPIU for which they claimed they were overbilled?

(b) If your answer to Interrogatory 8(a) is affirmative, (i) identify each such customer and (ii) state whether you ever sought to deny such a claim on the grounds that it was barred by a limitations period or by laches.

(c) If your answer to Interrogatory 8(b)(ii) is affirmative, set forth in detail the source and amount of time (example: years or months) of each such limitations period that you claim was applicable.

9. Identify the person(s) who participated in the decision whether to purchase or use the Agilent product, (also known as "Business Intelligence System") identified in ¶ 9 of the

Complaint, including the person(s) who participated in the analysis, testing, installation and operation of the Agilent product. For each person(s) describe the activities this person performed.

10. State the exact date that BellSouth implemented its new computer system, the Agilent Company product known as "Business Intelligence System" for calls originating or terminating in Tennessee.

11. State the exact date that BellSouth began recording Global Crossing's call information in Tennessee using the Agilent Company product known as "Business Intelligence System."

12. State the exact date that BellSouth began submitting bills to Global Crossing using the Agilent Company product known as Business Intelligence System, for PIU that you contend applies to Global Crossing in Tennessee.

13. For each calendar quarter for which you seek compensation, describe in detail the systems, software and processes used to calculate the PIU you contend applies to Global Crossing in Tennessee.

14. For each calendar quarter identified in Interrogatory 13 of the Complaint, identify the person(s) responsible for testing, analyzing and verifying the PIU you contend applies to Global Crossing in Tennessee. For each person(s), describe the activities this person performed. Identify all documents describing, summarizing, analyzing or verifying the PIU you contend applies to Global Crossing in Tennessee, and identify where the records of such calls are maintained, stored or preserved.

15. For each calendar quarter identified in Interrogatory 13 of the Complaint, state whether BellSouth placed any test calls routed over the Global Crossing network in order to test or verify Global Crossing's PIU. If any test calls were made, identify the person(s) who participated in the design, supervision, placement or analysis of such test calls. Identify all documents describing, summarizing or analyzing such calls; identify where the records of such calls are maintained, stored or preserved; and state whether any such records have been discarded or destroyed at any time between 1994 and 2001.

16. For each calendar quarter identified in Interrogatory 13, state whether BellSouth performed any independent audits of Global Crossing's reported PIUs in order to verify Global Crossing's PIU reports. If any independent audits were made, identify the person(s) who participated in the design, supervision, placement or analysis of audits. Identify all documents describing, summarizing or analyzing such audits, and identify where the records of such audits are maintained, stored or preserved; and state whether any such records have been discarded or destroyed at any time between 1994 and 2001.

17. Identify each and every complaint, arbitration, mediation or other legal proceeding, whether federal, state, administrative, formal or informal, in which use of the Agilent Company product known as Business Intelligence System, as used by BellSouth or otherwise, has been an issue. Provide the full citation to the proceeding. State the issue presented involving the Agilent Company product known as Business Intelligence System, and state the resolution of the issues. Provide citations to any written opinions or settlements involving the Agilent Company product known as Business Intelligence System.

18. Identify the person(s) deposed during any of the proceedings identified in Interrogatory 17 and the issue(s) to which the person(s) testified. Provide copies of any such testimony produced.

19. Identify any documents used to support the testimony provided by the person(s) identified in Interrogatory 18 of during the proceedings identified in Interrogatory 17. Provide any copies of such documents used in or attached to their testimony.

20. Identify the person(s) who participated in the review of the PricewaterhouseCoopers, LLP, audit report of Global Crossing's reporting procedures, provided by Global Crossing to BellSouth. For each person(s), describe the activities this person performed.

21. Identify the methodology used by BellSouth in the review of the PricewaterhouseCoopers, LLP, audit report of Global Crossing's reporting procedures, provided by Global Crossing to BellSouth.

22. Identify the reason(s) for BellSouth rejecting the PricewaterhouseCoopers, LLP audit report of Global Crossing's reporting procedures. For each reason(s) provided, identify the person(s) providing the reason and any documentation used to support the person(s) rationale. Identify any reports, memorandum, documentation, letters, emails or other written documents, produced by BellSouth in connection with its rejection of the PricewaterhouseCoopers, LLP audit report of Global Crossing's reporting procedures.

23. If any reports, memorandum, documentation, letters, emails or other written documents were produced by BellSouth in connection with its rejection of the PricewaterhouseCoopers, LLP audit report of Global Crossing's reporting procedures, identify the person(s) who created, drafted, review, signed or approved such reports, memorandum, documentation, letters, emails or other written documents. Identify where the records of such calls are maintained, stored or preserved; and state whether any such records have been discarded or destroyed at any time between 1994 and 2001.

24. State whether BellSouth performed any independent audits of Global Crossing's reported PIUs in order to verify PricewaterhouseCoopers, LLP audit report of Global Crossing's reporting procedures. If any independent audits were made, identify the person(s) who participated in the design, supervision, placement or analysis of audits. Identify all documents describing, summarizing or analyzing such audits, and identify where the records of such audits are maintained, stored or preserved; and state whether any such records have been discarded or destroyed at any time between 1994 and 2001.

25. Identify the person(s) involved in the decision to file the Complaint.

26. Identify all communications that you had relating as to whether any part or all of the Claims are barred by any limitations period or should be dismissed on the grounds of laches.

27. Identify the person(s) with knowledge of the facts alleged in the Complaint as well as each particular paragraph within the Complaint for which each such person(s) has/have knowledge.

28. For each of these Interrogatories, identify the person(s) who drafted, or who assisted in the drafting of, the answers to each of these Interrogatories.

29. Identify all the person(s), including but not limited to any experts, that you intend to call as witnesses in this matter, as well as the subject matter and detail of the testimony, which each such witness (including any expert) is expected to testify.

30. If any reports, memorandum, documentation, letters, emails or other written documents, including documents filed with a state public utility commission or the Federal Communications Commission, were produced or filed by BellSouth in connection with any modification of a federal or state tariff regarding the calculation or verification of PIU and any limitation to legal causes of action, backbilling or refund policies or procedures, identify the person(s) who created, drafted, review, signed or approved such reports, memorandum, documentation, letters, emails or other written documents. Identify where the records of such calls are maintained, stored or preserved; and state whether any such records have been discarded or destroyed at any time between 1994 and 2001.

31. State each instance BellSouth has relied or cited Section 415 of the Communications Act, 47 U.S.C. § 415, or otherwise relied or cited any element of a BellSouth state or federal tariff as limiting a legal cause of action, backbilling, refund or any other cause of action. Identify all documents describing, summarizing or analyzing such arguments, and identify where the records, including all documents filed with a state utility commission or the Federal Communications Commission, are maintained, stored or preserved; and state whether any such records have been discarded or destroyed at any time between 1994 and 2001.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: Henry Walker
Henry Walker
414 Union Street, Suite 1600
P.O. Box 198062
Nashville, Tennessee 37219
(615) 252-2363

Of Counsel
Steven A. Augustino
Erin W. Emmott
KELLEY DRYE & WARREN LLP
1200 19th Street
Suite 500
Washington, DC 20036
(202) 955-9600 (O)
(202) 955-9792 (F)

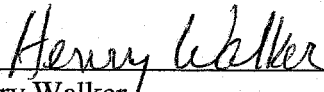
Michael J. Shortley, III
GLOBAL CROSSING NORTH AMERICA, INC.
180 South Clinton Avenue
Rochester, New York 14646
(716) 777-1028 (O)
(716) 546-7823 (F)

Dated: November 15, 2001

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via fax or hand delivery and U.S. mail to the following on this the 15th day of November, 2001.

Guy Hicks, Esq.
BellSouth Telecommunications, Inc.
333 Commerce St., Suite 2101
Nashville, TN 37201-3300



Henry Walker

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

IN RE: COMPLAINT OF BELL SOUTH)	
TELECOMMUNICATIONS, INC.)	
REGARDING THE PRACTICES OF)	DOCKET NO. 01-00913
GLOBAL CROSSING)	
TELECOMMUNICATIONS, INC. IN THE)	
REPORTING OF PERCENT INTERSTATE)	
USAGE FOR COMPENSATION FOR)	
JURISDICTIONAL ACCESS SERVICES)	

**RESPONDENT'S FIRST REQUEST FOR THE PRODUCTION OF DOCUMENTS TO
COMPLAINANT**

Respondent Global Crossing Telecommunications, Inc., ("Global Crossing") by its attorneys, pursuant to the Hearing Officer's Order Establishing Procedural Schedule, issued November 8, 2001, hereby requests Complainant, BellSouth Telecommunications, Inc. ("BellSouth") to produce for inspection and copying the originals of the documents described in Section III below, at the offices of Henry Walker, Boulton, Cummings, Connors & Berry, PLC, 414 Union Street, Suite 1600, Nashville, Tennessee 37219, on or before November 23, 2001.

I. INSTRUCTIONS

1. For each document responsive to this request that is withheld under a claim of privilege or work-product immunity, provide a statement identifying: (a) each author; (b) each addressee; (c) each person to whom the document was sent; (d) the custodian of the original and each copy of the document as of the date of your response to this request; (e) the exact location of the original and each copy of the document as of the date of your response to this request; (f) the title and date of the document; (g) the number of pages in the document; (h) the nature and subject matter of the document sufficient to accurately identify the document; (i) the

privilege or immunity claimed and facts giving rise to that privilege or immunity; and (j) the specific numbered request to which the document is responsive.

2. If you object to any request on grounds other than privilege or work-product immunity, state in detail the basis for the objection.

3. If you contend that a particular request, or a definition or an instruction applicable thereto, is ambiguous, such claim shall not provide a basis for refusing to respond. You are instructed to set forth the allegedly ambiguous language and the interpretation of that language that you have adopted in responding to the request in question.

4. You should produce every copy of a document that is not identical to the original of the document requested, including copies with marginalia.

5. You should either organize and segregate the documents you produce according to the specific numbered requests listed below to which the documents are primarily responsive, and identify the source of each document, or if they are being produced in their original form, identify where the document was located, including but not limited to what room, file cabinet and drawer, what persons have access to that area and produce a copy of the file folder jacket in which the document was contained.

6. You should produce all documents requested below that are within your possession, custody or control, including documents within the possession, custody or control of your present or former attorneys, accountants, representatives, consultants, agents, officers, directors, employees, investigators, or anyone else acting on your behalf.

7. With respect to each document otherwise responsive to this request that has been lost, discarded or destroyed, identify (a) each author; (b) each addressee; (c) the date, title and subject matter of the document; (d) the date of the disposal; (e) the manner of the disposal; (f) the

reason for the disposal; (g) each person who authorized the disposal; (h) each person who carried out the disposal; and (i) each person with any knowledge concerning the disposal.

8. With respect to each document otherwise responsive to this request that is no longer in your possession, custody or control, identify (a) each author; (b) each addressee; (c) the title, date, and subject matter of the document; (d) the last date on which the document was in your control; (e) each person now in control of the document; (f) the reasons for the disposal or release of the document; and (g) each person with any knowledge concerning the document's disposal or release.

9. The present tense includes the past and future tenses.

10. The use of the singular form of any word includes the plural and vice-versa and shall be construed as necessary to bring within the scope of these discovery requests all responses that might otherwise be construed to be outside of its scope.

11. The connectors "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these discovery requests all responses that might otherwise be construed to be outside of their scope.

12. Documents should be produced in a manner that identifies the files of the entity and person from which they were produced.

II. DEFINITIONS

1. The term "document" is used in its broadest sense and means and includes graphic matter of any kind or nature, whether written, printed, typed, recorded, filmed, punched, transcribed, taped or produced or reproduced by any means. The term "document" means and includes, without limitation, all appraisals, records, personal notes, e-mails, cablegrams, telexes, facsimiles, studies, calendars, day-timers, diaries, desk calendars, appointment books, agendas,

minutes, pamphlets, envelopes, telephone messages, graphs, records of meetings, summaries or records of telephone conversations, summaries or records of personal conversations or interviews, summaries or records of meetings or conferences, tabulations, analyses, evaluations, projections, work papers, statements, summaries, reports, journals, billing records, invoices, correspondence, letters, financial statements, balance sheets, accounting entries, tax returns, loan documents, and/or all written or recorded matter of any kind whatsoever. The term "document" also means and includes every other means by which information is recorded or transmitted including, without limitation, photographs, videotapes, tape recordings, microfilms, punchcards, computer programs, printouts, computer disks or diskettes, software, all recordings made through data processing and/or computer techniques, and the written information necessary to understand and use such materials. The term "document" is further defined to mean the original, any drafts, and any non-identical copies (*i.e.*, those bearing notations, marks, or marginalia not found on the original document). Please note that records of electronic mail, whether active, archived or otherwise recoverable, are specifically included within the above definition.

2. The term "person" refers to a natural person, a group of natural persons acting as individuals, a group of persons acting in a collegial capacity (*e.g.*, as a committee, board of directors, etc.), a trust, a corporation, a partnership, a limited partnership, a joint venture, a limited liability company, a government or governmental agency and/or any other incorporated or unincorporated business, government or entity.

3. The terms "you" and "your" refers to Complainant BellSouth, and includes each of your present or former attorneys, accountants, representatives, consultants, agents, officers, directors, employees, investigators, predecessor corporations or entities, and subsidiaries or other related entities or anyone else acting on your or their behalf.

4. The term "employee" includes any person, including all executives, managers, supervisors, and professionals, who are or have been employed on a full or part-time basis.

5. The term "relating to" means constituting, containing, embodying, reflecting, identifying, describing, incorporating, referring to, dealing with or in any way in connection with or pertaining to.

6. The term "Complaint" shall mean the "Complaint of BellSouth Telecommunications, Inc. Regarding the Practices of Global Crossing Telecommunications, Inc. in the Reporting of Percent Interstate Usage for Compensation for Jurisdictional Access Services," filed before the Tennessee Regulatory Authority in Docket No. 01-00913.

7. The connectors "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the Interrogatory all responses that might otherwise be construed to be outside of its scope.

III. DOCUMENTS TO BE PRODUCED

You are requested to produce the following documents:

1. Any and all documents relating to your answers to Respondent's First Set of Interrogatories to Complainant.

2. Any and all documents relating to whether any part or all of your claims in ¶¶ 11 and 12 of the Complaint ("the Claims") that

11. After reviewing Global Crossing's call-activity records for the period from 1994 to 2000, BellSouth determined that Global Crossing had misreported its TPIU for that period. As a result of the misreported TPIU, Global Crossing paid lower intrastate access charges than it should have.

12. Based on Global Crossing's misreported TPIU, BellSouth underbilled Global Crossing \$121,853.00 for the period between 1994 and 2000 with respect to terminating access service provided in Tennessee. When applicable late-payment charges are added, the total amount that Global Crossing owes BellSouth for Tennessee is \$175,455.00.

as well as any other claims contained in the Complaint, are governed or barred by any limitations period contained in any statute, tariff or elsewhere.

3. Any and all documents relating to whether any or all of your Claims, as well as any other claims contained in the Complaint, are susceptible to the equitable defense of laches.

4. Any and all documents relating to the "formal written demand upon Global Crossing for payment" (referenced in ¶ 14 of the Complaint) of amounts allegedly owed by Global Crossing to you for (allegedly) misreported terminating PIU ("TPIU") as the term "TPIU" is used in ¶ 7 of the Complaint.

5. Any and all documents relating to any oral or written demands upon Global Crossing for allegedly misreported TPIU prior to the "formal written demand upon Global Crossing for payment" referenced in ¶ 14 of the Complaint.

6. Any and all documents relating to Global Crossing's call-activity records for the period from 1994 to 2000, including but not limited to your review thereof as alleged in ¶ 11 of the Complaint.

7. Any and all documents relating to any review of Global Crossing's call-activity records for any time from 1994 to 2000, prior to the time of your review of such call-activity records as alleged in ¶ 11 of the Complaint.

8. Any and all documents relating to any claims or demands made by any of your customers against you, or any claims or demands made by you against any of your customers for any misreported TPIU.

9. Any and all documents relating to the Agilent product, also known as "Business Intelligence System", identified in ¶ 9 of the Complaint, including but not limited to:

(i) any and all documents relating to and/or verifying the date that BellSouth first implemented or used the Business Intelligence System for calls originating or terminating in Tennessee;

(ii) any and all documents relating to and/or verifying the date that BellSouth first implemented or used the Business Intelligence System for calls originating or terminating anyplace apart from Tennessee;

(iii) any and all documents relating to and/or verifying the date that BellSouth began recording Global Crossing's call information in Tennessee using the Business Intelligence System;

(iv) any and all documents relating to and/or verifying the date that BellSouth began submitting bills to Global Crossing using the Business Intelligence System for PIU you contend applies to Global Crossing in Tennessee.

10. Any and all documents relating to the PIU you contend applies to Global Crossing in Tennessee, including but not limited to:

(i) any and all documents relating to the systems, software and processes used to calculate such PIU for each calendar quarter for which you seek compensation;

(ii) any and all documents relating to any and all summaries, analyses or verifications of such PIU and/or the records of calls upon which such PIU is based;

(iii) any and all documents relating to the maintenance, preservation, destruction or discarding of records of calls upon which such PIU is based.

11. Any and all documents relating to any and all summarizes analyses, and/or test calls routed over the Global Crossing network in order to test or verify Global Crossing's PIU, including but not limited to documents relating to the call detail records, maintenance, preservation, destruction or discarding of such documents

12. Any and all documents relating to any independent audits of Global Crossing's reported PIUs, including but limited to any and all documents relating to (i) verification of Global Crossing's PIU reports, and (ii) the maintenance, preservation, destruction or discarding of such documents

13. Any and all documents relating to any complaint, arbitration, mediation, other legal proceeding, settlement or written opinion, whether federal, state, administrative, formal or informal, relating, in turn, to the Agilent Company product known as Business Intelligence System (collectively the "Matters"), including but not limited to:

(i) any and all testimony, documents, depositions, interrogatories, other discovery documents and/or exhibits relating to the Matters;

14. Any and all documents relating to the PricewaterhouseCoopers, LLP, audit report of Global Crossing's reporting procedures (the Audit Report") , provided by Global Crossing to BellSouth, including but not limited to:

(i) any and all documents relating to the methodology used by you in the review of the Audit Report;

(ii) any and all documents relating to BellSouth's rejection and/or verification of the Audit Report, and/or Global Crossing's reporting procedures.

15. Any and all documents relating to any actual or attempted modification by you of a federal or state tariff regarding the calculation or verification of PIU and any limitation to legal causes of action, backbilling or refund policies or procedures.

16. Any and all documents relating to your reliance on or citation to (i) Section 415 of the Communications Act, 47 U.S.C. § 415, or to (ii) any BellSouth state or federal tariff, for the purpose of limiting a legal cause of action, backbilling, refund or any other cause of action by a customer against you.

17. Any and all documents relating to whether you ever sought to deny a legal cause of action, backbilling, refund or any other cause of action by a customer against you on the grounds that it was barred by a limitations period or by laches.

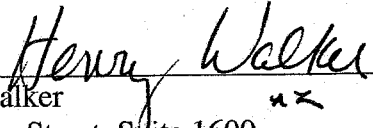
18. Any and all documents relating to (regardless whether supporting or not supporting) each and every one of the allegations contained in the Complaint.

19. Any and all documents upon which you or any of your witnesses intend to rely at the hearing in this matter.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: _____


Henry Walker
414 Union Street, Suite 1600
P.O. Box 198062
Nashville, Tennessee 37219
(615) 252-2363

Of Counsel
Steven A. Augustino
Erin W. Emmott
KELLEY DRYE & WARREN LLP
1200 19th Street
Suite 500
Washington, DC 20036
(202) 955-9600 (O)
(202) 955-9792 (F)

Michael J. Shortley, III
GLOBAL CROSSING NORTH AMERICA, INC.
180 South Clinton Avenue
Rochester, New York 14646
(716) 777-1028 (O)
(716) 546-7823 (F)

Dated: November 15, 2001

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via fax or hand delivery and U.S. mail to the following on this the 15th day of November 2001.

Guy Hicks, Esq.
BellSouth Telecommunications, Inc.
333 Commerce St., Suite 2101
Nashville, TN 37201-3300

Henry Walker
Henry Walker *HW*